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10 Attorneys for Defendant

11 International Business Machines Corporation

12 UNITED STATES DISTRICT COURT

13 NORTHERN DISTRICT OF CALIFORNIA

14 (SAN JOSE DIVISION)

15 MARY HELEN WOODSON,

16 Plaintiff,

17 vs.

18 INTERNATIONAL BUSINESS MACHINES
19 CORPORATION and DOES ONE through
20 TWENTY, Inclusive,

21 Defendant.

CASE NO. C 05-03939 JF

CASE NO. C 05-3387 JF

**STIPULATION CONTINUING HEARING
ON IBM'S MOTION TO DISMISS AND
CONTINUING CASE MANAGEMENT
CONFERENCE**

**NOT SUBJECT TO E-FILING:
PLAINTIFF IS PRO SE**

22 Pursuant to *Civil Local Rule 6-1(a)*, plaintiff Mary Helen Woodson and defendant

23 International Business Machines Corporation ("IBM") stipulate as follows:

24 WHEREAS, IBM has filed a motion to dismiss in Case No. C 05-3939, which motion is
25 presently set for hearing on June 23, 2006;

26 WHEREAS, the Court has scheduled a further case management conference in Related
27 Case Nos. C 05-3939 and C 05-3387 for June 23, 2006;

28 WHEREAS, plaintiff is presently out-of-state for an undetermined period caring for a
family member and has requested that IBM agree to continue the hearing on its motion to dismiss
and further requested that IBM stipulate to continue the Case Management Conference;

1 WHEREAS, IBM has agreed to accommodate plaintiff's requests;

2 NOW, THEREFORE, THE PARTIES HEREBY STIPULATE AS FOLLOWS:

3 1. The hearing on IBM's motion to dismiss is continued from June 23, 2006 to July
4 21, 2006 at 9:00 a.m.;

5 2. Neither party will submit additional briefing in connection with the Motion to
6 Dismiss;

7 3. The case management conference in Related Case Nos. C 05-3939 and C 05-3387
8 is continued from June 23, 2006 to July 21, 2006 at 9:00 a.m.

9 4. IBM need not submit an additional case management conference statement in
10 advance of this continued case management conference.

11 IT IS SO STIPULATED

12
13 DATED: June 20, 2006

QUINN EMANUEL URQUHART OLIVER &
HEDGES, LLP

14
15 By 
16 Patrick Doolittle
17 Attorneys for Defendant, International Business
18 Machines Corporation

19 DATED: June __, 2006

MARY HELEN WOODSON

20
21
22 By _____
23 Mary Helen Woodson

24 PURSUANT TO STIPULATION, IT IS SO ORDERED

25 Dated: 6-20-06

26
27 
28 Hon. Jeremy Fogel
United States District Judge

JUN-20-2006 TUE 05:22 AM

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1 WHEREAS, IBM has agreed to accommodate plaintiff's requests;

2 NOW, THEREFORE, THE PARTIES HEREBY STIPULATE AS FOLLOWS:

3 1. The hearing on IBM's motion to dismiss is continued from June 23, 2006 to July
4 21, 2006 at 9:00 a.m.;

5 2. Neither party will submit additional briefing in connection with the Motion to
6 Dismiss;

7 3. The case management conference in Related Case Nos. C 05-3939 and C 05-3387
8 is continued from June 23, 2006 to July 21, 2006 at 9:00 a.m.

9 4. IBM need not submit an additional case management conference statement in
10 advance of this continued case management conference.

11 IT IS SO STIPULATED

12
13 DATED: June __, 2006

QUINN EMANUEL URQUHART OLIVER &
HEDGES, LLP

14
15 By _____

Patrick Doolittle
Attorneys for Defendant, International Business
Machines Corporation

16
17
18
19 DATED: June 19, 2006

MARY HELEN WOODSON

20
21 By Mary Helen Woodson

Mary Helen Woodson

22
23
24 PURSUANT TO STIPULATION, IT IS SO ORDERED

25
26 Dated: _____

27
28 Hon. Jeremy Fogel
United States District Judge